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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re

CASH CLOUD, INC.,
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**STIPULATION TO EXTEND
DEADLINES**

Cash Cloud, Inc. dba Coin Cloud (“Debtor”), debtor and debtor in possession in the above-captioned case (the “Chapter 11 Case”), by and through its counsel Fox Rothschild LLP and Brink’s Incorporated (“Brink’s” and together with the Debtor, the “Parties”), by and through its counsel Hirschler Fleischer, P.C., stipulate and agree as follows (the “Stipulation”):

RECITALS

A. WHEREAS, on February 7, 2023, Debtor filed a voluntary petition under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Nevada (the “Court”), commencing the Chapter 11 Case;

B. WHEREAS, on April 7, 2023, the Debtor filed a *Motion for Entry of an Order: (A) Approving Auction and Bidding Procedures for Potential Plan Sponsors or the Purchase of*

1 *Substantially All of the Debtor's Assets; (B) Approving Form Notice to be Provided to Interested*
 2 *Parties; and (C) Scheduling a Hearing to Consider Approval of the Highest and Best Transaction,*
 3 *Cure Objections, and Confirmation of the Proposed Toggle Plan [ECF No. 392];*

4 C. WHEREAS, on April 27, 2023, the Court entered the *Order Establishing Bidding*
 5 *Procedures and Related Deadlines [ECF No. 483] (the "Bid Procedures Order")*;

6 D. WHEREAS, on May 9, 2023, the Court entered an *Order Approving Stipulation to*
 7 *Extend Bid Deadline, Reschedule Auction and Move Deadlines Re: Cure Notices and Objection [ECF*
 8 *No. 538] (the "First Extension Order")* extending certain deadlines in the Bid Procedures Order;

9 E. WHEREAS, on May 12, 2023, the Court entered the *Order Pursuant to 11 U.S.C. §*
 10 *105(d)(2)(B)(vi), Fed. R. Bankr. P. 3017.1 and Local Rule 3017 Implementing Expedited Solicitation*
 11 *and Confirmation Procedures Including: (I) Conditionally Approving Disclosure Statement; (II)*
 12 *Setting Combined Hearing of Final Approval of Disclosure Statement and Plan Confirmation; (III)*
 13 *Approving (A) Form and Scope of Combined Hearing Notice, and (B) Form or Ballots; (IV)*
 14 *Scheduling Voting and Objection Deadlines; and (V) Granting Related Relief [ECF No. 554], which*
 15 *set the deadline by which parties must object to the Plan and Disclosure Statement (the "Plan*
 16 *Objection Deadline") and the deadline by which parties must vote on the Plan and Disclosure*
 17 *Statement (the "Plan Voting Deadline") as June 12, 2023 at 5:00 p.m. (Pacific Time);*

18 F. WHEREAS, the Auction was held on June 2, 2023 and Heller Capital Group, LLC
 19 ("Heller Capital") was selected as one of the winning bidders;

20 G. WHEREAS, on June 9, 2023, the Debtor, CKDL Credit, LLC, Genesis Global Holdco,
 21 LLC, Enigma Securities Limited, and the Official Committee of Unsecured Creditors filed the *Second*
 22 *Stipulation To Move Deadlines Re: Cure Notices and Objections [ECF No. 645] (the "Second*
 23 *Extension Stipulation")* extending certain deadlines set forth in the First Extension Order—namely,
 24 (1) the date for service of Cure Notices to June 13, 2023; (2) the Contract Objection Deadline to June
 25 22, 2023 at 5:00 p.m. (Pacific Time) (the "Sale Objection Deadline"); and (3) the Cure Reply Deadline
 26 to June 26, 2023 at 5:00 p.m. (Pacific Time)—to allow time for Heller Capital to consider increasing
 27 its bid by purchasing certain executory contracts and unexpired leases, including the Brink's contract;
 28 and

H. WHEREAS, in light of the Second Extension Stipulation and consistent therewith, the Parties desire to extend the Plan Voting Deadline and the Plan Objection Deadline for Brink's to June 22, 2023 at 5:00 p.m. (Pacific Time).

NOW, THEREFORE, the Parties hereby stipulate and agree to the following:

IT IS STIPULATED AND AGREED that:

1. The Sale Objection Deadline shall be moved to June 22, 2023 at 5:00 p.m. for Brink's;
 2. The Plan Voting Deadline shall be moved to June 22, 2023 at 5:00 p.m. for Brink's;
- and
3. The Plan Objection Deadline shall be moved to June 22, 2023 at 5:00 p.m. for Brink's.
 4. The Plan Reply Deadline for any Brink's Objections shall be moved to June 27, 2023, at 5:00 p.m. (Pacific Time).

Dated this 12th day of June 2023.

FOX ROTHSCHILD LLP

HIRSCHLER FLEISCHER, P.C.

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